

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

EUGUENE SCALIA,
SECRETARY OF LABOR,
UNITED STATES DEPARTMENT
OF LABOR,

Plaintiff,

v.

BUSHIDO, INC. d/b/a KYOTO
STEAKHOUSE, and
GUANGCHUN (JOHN) LI, individually,

Defendants.

CIVIL ACTION FILE
NO. 4:19-cv-3111

PLAINTIFF’S MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff, Eugene Scalia, the Secretary of Labor of the United States Department of Labor, hereby moves this Court for entry of the proposed Consent Judgment against Defendants Bushido Inc. d/b/a Kyoto Steakhouse, and Guangchun (John) Li, individually (collectively the “Defendants”).

In support of this Motion, Plaintiff states that Defendants have consented to the entry of this Judgment. Plaintiff will forward a copy of the proposed Judgment, with Defendants’ electronic signatures indicating their consent, to the Court concurrently with this filing. Pursuant to NECivR. 11.1, Plaintiff will maintain a copy of the Judgment with original signatures.

WHEREFORE, Defendants having consented to the entry of Judgment against them, Plaintiff respectfully requests that this Court enter the proposed Consent Judgment submitted concurrently with this Motion.

Respectfully submitted,

Kate S. O'Scannlain
Solicitor of Labor

Christine Z. Heri
Regional Solicitor

Evert H. Van Wijk
Associate Regional Solicitor

s/ Elaine M. Smith
Elaine M. Smith
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U.S. Department of Labor
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of December, 2020, I electronically filed the foregoing *PLAINTIFF'S MOTION FOR ENTRY OF CONSENT JUDGMENT* with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to:

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Attorney for Defendants

s/ Elaine M. Smith